

PECKAR & ABRAMSON, P.C.

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

EARLE REFINING, LLC,

Plaintiff,

vs.

NEW VACUUM TECHNOLOGIES LLC
and NORTH JERSEY PETROLEUM
OPERATIONS, LLC,

Defendants.

Case No. 3:22-cv-04469-RK-DEA

ECF CASE – Electronically Filed

**NOTICE OF
MOTION TO
WITHDRAW**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Kevin J. O'Connor, Esq., dated March 25, 2024, the law firm Peckar & Abramson, P.C. ("P&A"), counsel to Defendants, New Vacuum Technologies LLC and North Jersey Petroleum Operations, LLC (collectively "Defendants"), will move this Court, at the United States District Court located at 402 East State Street Office Room 2020, Trenton, New Jersey 08608, before the Honorable Robert Kirsch, U.S.D.J., on May 6, 2024, for an Order pursuant to Local Civil Rule 102.1 granting P&A's application and relieving P&A as counsel for Defendants, together with such other and further relief as the Court deems just and proper.

LAW OFFICES

**Peckar &
Abramson**

A Professional Corporation

PLEASE TAKE FURTHER NOTICE that answering and reply papers to this motion shall be served in accordance with the Local Rules of this Court.

Dated: March 26, 2024

PECKAR & ABRAMSON, P.C.

By: /s/ Kevin J. O'Connor
KEVIN J. O'CONNOR, ESQ.
70 Grand Avenue
River Edge NJ 07661
201-343-3434
Attorneys for Defendants

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DECLARATION OF SERVICE

I state upon penalty of perjury that on March 26, 2024, a true and correct copy of the within Notice of Motion with accompanying declaration and memorandum, was duly served upon all counsel of record by ECF, and was simultaneously emailed and was placed in the hands of a vendor for personal service upon Defendants, as follows:

New Vacuum Technologies LLC and North Jersey Petroleum Operations, LLC, c/o Joseph Laura, 21 Kirsten Drive, Freehold, New Jersey 07728, and emailed to jlaura3848@gmail.com.

Dated: March 26, 2024

PECKAR & ABRAMSON, P.C.

By: /s/ Kevin J. O'Connor
KEVIN J. O'CONNOR, ESQ.
70 Grand Avenue
River Edge NJ 07661
201-343-3434
Attorneys for Defendants

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